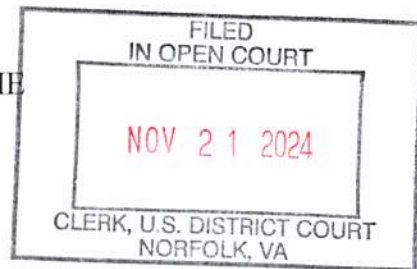


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Norfolk Division*



UNITED STATES OF AMERICA

v.

RONDELL CLARK,  
(Counts 1-2)  
and

CHRISTOPHER CLARK  
(Count 1)

Defendant.

UNDER SEAL

CRIMINAL NO. 2:24-cr- 131

18 U.S.C. § 1349  
Conspiracy to Commit Mail Fraud  
(Count 1)

18 U.S.C. § 1341  
Mail Fraud  
(Count 2)

18 U.S.C. §§ 981(a)(1)(C) & 28  
U.S.C. § 2461  
Asset Forfeiture

INDICTMENT

November 2024 Term-at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

At all times relevant to this Information, unless otherwise stated:

INTRODUCTORY ALLEGATIONS

1. R. CLARK is the current spouse of C. CLARK.
2. Victim R.C. resides in Chesapeake, Virginia.
3. P.F. is the boyfriend of R.C. and resides with her in Chesapeake, Virginia.
4. Chesapeake, Virginia is located within the Eastern District of Virginia.
5. On or about December 22, 2015, C. CLARK and R.C. finalized their divorce in the Virginia Beach Circuit Court in Virginia Beach, Virginia. Pursuant to the final separation agreement between C. CLARK and R.C., R.C. was entitled to a share of C. CLARK's military retirement.

6. C. CLARK later retired from the U.S. Navy. On July 7, 2022, the Defense Finance Accounting Service (DFAS) informed R.C. that, pursuant to their divorce decree, she would receive a percentage of C. CLARK's retirement pay. Her first payment would be on or about September 1, 2022.

7. "American Extradition and Court Support Services" or "AES" is not a real company and was used for the purpose of effectuating the mail fraud scheme against R.C.

8. Neither "Junior Mills" nor "TJ Mills" ever represented C. CLARK or R. CLARK in any capacity in relation to R.C.'s claim against C. CLARK's military retirement.

COUNT ONE

(Conspiracy to Commit Mail Fraud)

9. Paragraphs 1-8 of the Introductory Allegations of the Information are realleged and incorporated as if fully set forth herein.

10. From on or about July 30, 2022, through on or about December 15, 2022, in the Eastern District of Virginia and elsewhere, RONDELL CLARK, and CHRISTOPHER CLARK ("defendants"), knowingly and intentionally combined, conspired, confederated and agreed to commit mail fraud. Specifically, the defendants, and others known and unknown, having devised a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme or artifice and attempting so to do, placed and caused to be placed in a post office and authorized depository for mail matter, a matter and thing whatever to be sent and delivered by the Postal Service, and deposited and caused to be deposited a matter and thing whatever to be sent and delivered by a private and commercial interstate carrier, and knowingly caused to be delivered by mail and such carrier according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, in

violation of Title 18, United States Code, Section 1341.

THE PURPOSE OF THE CONSPIRACY

11. From on or about July 30, 2022, to December 15, 2022, in Chesapeake, Virginia, and elsewhere, the defendants, R. CLARK, and C. CLARK, did knowingly devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, the purpose of which was to stop R.C. from receiving her rightful portion of C. CLARK's military retirement.

THE WAYS, MANNER, AND MEANS OF THE CONSPIRACY

12. The ways, manner, and means by which the defendant sought to accomplish this conspiracy included, were not limited to, the following:

13. On or about July 22, 2022, R. CLARK and C. CLARK opened a Post Office Box in R.CLARK'S name located at 1525 U.S. Highway, 380 STE 500, Frisco, Texas.

14. On or about July 30, 2022, R. CLARK mailed a fraudulent letter to R.C. using the United States Postal Service ("USPS"), falsely claiming that R.C.'s claims against C. CLARK's military retirement were fraudulent, that R.C. owed C. CLARK child support in the amount of \$86,780.00, and that C. CLARK could have R.C.'s driver license revoked and her bank accounts garnished. This letter was on American Extradition and Court Support Services ("AES") letterhead and listed a return address of 1525 U.S. Highway, 380 STE 500, Frisco, Texas 75033.

15. This letter was mailed to R.C. at her address in Chesapeake, Virginia.

16. On or about July 30, 2022, R. CLARK mailed a fraudulent letter to P.F. using the USPS falsely claiming that a back child support case was opened against a member of his household and that, as a result, R.C. could be prosecuted for a felony, and R.C. and P.F.'s household property could be seized. This letter was on AES letterhead and listed a return address of 1525 U.S. Highway, 380 STE 500, Frisco, Texas 75033.

17. This letter was mailed to P.F. at his address in Chesapeake, Virginia.

17-014

18. On or about September ~~16~~, 2022, C. CLARK faxed a purported separation agreement to DFAS to evident R.C. waived her right to his military retirement in lieu of paying child support. In the fax, C. CLARK made misrepresentations to DFAS in a cover sheet wherein he claimed that this separation agreement was the official court copy. In truth and fact, the attached separation agreement had never been filed with the Virginia Beach Circuit Court and, therefore, this representation was false.

19. In the cover sheet, C. CLARK also purported that an attorney named “Junior Mills” was assisting him in this matter.

20. On or about November 15, 2022, the defendants caused a fax to be sent to DFAS from “TJ Mills” of AES Legal Services, which included a forged court order from the Circuit Court of the City of Richmond ordering DFAS to stop any and all payments to R.C.

21. On December 15, 2022, the defendants caused a fax to be sent to DFAS from “TJ Mills” of AES legal services requesting DFAS cease and desist all payments to R.C. The fax included a forged court order from Virginia Beach Circuit Court ordering DFAS to stop any and all payments to R.C.

(In violation of Title 18, United States Code, Section 1349.)

COUNTS TWO AND THREE

(Mail Fraud)

22. Paragraphs 1-21 of the Indictment are realleged and incorporated as if fully set forth herein.

23. On or about the dates listed below, in the Eastern District of Virginia and elsewhere, RONDELL CLARK, the defendant, having devised a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme or artifice and attempting so to do, placed and caused to be placed in a post office and authorized depository for mail matter, a matter and thing whatever to be sent and delivered by the Postal Service, and deposited and caused to be deposited a matter and thing whatever to be sent and delivered by a private and commercial interstate carrier, and knowingly caused to be delivered by mail and such carrier according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, each being a separate count as indicated:

Count	Date	Origin	Destination	Description
TWO	7/30/2022	<del>Eriseo, TX</del> Jacksonville, AK Doh	Chesapeake, VA	letter to R.C. letter to P.F.

(In violation of Title 18, United States Code, Section 1341.)

**FORFEITURE**

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. CHRISTOPHER CLARK and RONDELL CLARK, the defendants, if convicted of any of the violations set forth in this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).)

*United States v. Clark et al...*, 2:24-cr 131

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

\_\_\_\_\_  
FOREPERSON

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